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Respectfully submitted by:



Robert (Bobby) Lee

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served on the following counsel of record by certified mail, return receipt requested, on the 10/14 day of February, 2003:

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Robert G. Lee

FILED

FEB 12 2003

CLERK, U.S. DISTRICT COURT

By _____

Deputy

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

SCOTT STAETS

VS.

PORTEX, INC. d/b/a SIMS PROTEX,
INC., SIMS PORTEX, INC. d/b/a
PORTEX, INC. and SMITHS GROUP,
PLC d/b/a SMITHS MEDICAL d/b/a
SIMS PORTEX, INC. d/b/a PORTEX,
INC.§
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CIVIL ACTION NO. 3:02-CV-2085-R

PLAINTIFF'S EXPERT DISCLOSURE

TO: Defendant Portex, Inc., et al., by and through it's attorney of record, Ms. Melissa M. Goodman, HAYNES AND BOONE, LLP, 901 Main Street, Suite 3100, Dallas, Texas 75202-3789.

Plaintiff, Scott Staets, make these expert disclosures as required by Federal Rule of Civil Procedure 26(a)(2) and Order of the Court.

A. Identity of Experts

1. The following persons may be used as trial to present evidence under Federal Rules of Evidence 702, 703 or 705, additionally these experts are expected to testify regarding the reasonableness of the hourly fee charged by Plaintiff's Counsel and the normal hourly fees charged by employment counsel with similar experience and/or board certifications:

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